

1032

December 22, 2015

Placer County Community Development Resource Agency Environmental Coordination Services 3091 County Center Drive, Suite 190 Auburn, CA 95603 Via email: cdraecs@placer.ca.gov

Placer County Community Development Resource Agency:

MARTIS VALLEY WEST PARCEL SPECIFIC PLAN PROJECT STATE CLEARINGHOUSE NO. 2014032087

Northstar California would like to extend its support for the Martis Valley West Parcel Specific Project Plan. We commend the project applicant on collaboration with regional stakeholders to reduce density in the Martis Valley and conserve approximately 6,376 acres on the east side of Highway 267. Overall, we believe the project is compatible with the North Lake Tahoe Region and is appropriate to our regional environmental and economic setting.

With this consideration, we respectfully provide the following comments on the project's Draft Environmental Impact Report (DEIR):

- 1. Northstar urges Placer County to reject the conclusion of Significant and Unavoidable traffic impacts associated with the project and to require solutions to mitigate traffic impacts to less than significant levels. The DEIR identifies failing Levels of Service (LOS) at key intersections and roadway segments that provide the access to and within the Northstar community. Traffic fees are proposed to mitigate the impacts. The DEIR, however, acknowledges that the associated Placer County Capital Improvement Program (CIP) projects will not be constructed prior to the proposed project and its impacts. Traffic and congestion reduction measures should not be deferred with unknown timelines and funding. The DEIR acknowledges that the intersection and roadway improvements necessary to bring acceptable LOS to regional intersections and roadway segments are managed and funded by multiple jurisdictions. Further it is stated that it is unknown when or if these improvements will be constructed. Since traffic mitigation projects cannot be guaranteed, Northstar urges Placer County to identify solutions that may be implemented with project construction to mitigate traffic impacts to less than significant levels.
- Northstar further recommends the following measures and issues be considered to address traffic impacts within the Northstar community:

1032-2

1032-1

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 a. The proposed sign on Highlands View Drive (MM 10-1c) should be a permanent, changeable message sign allowing Northstar to provide traffic information to residents and guests;

- Signage for the Northstar Drive ingress and egress at Highway 267 should be improved to clearly delineate the turn lanes onto Hwy 267 (eastbound) and into the Village/Castle Peak Parking Lot (westbound);
- c. Signage on Highway 267 should be installed alerting drivers to the MVWP access road, Highlands View Drive, and Northstar Drive. Signage should be installed for both the northbound and southbound directions:
- d. The DEIR identifies the potential for the project to generate 122 FTE employees. This is not an insignificant amount of trip generation. The traffic analysis should evaluate the impact of employee vehicle trips. The project should identify onsite employee parking within the project area in order to minimize additional trips within Northstar and impacts to existing approved parking;

e. How is the existing Level of Service (LOS) and delay at Highlands View Road/Ridgeline Drive, Ridgeline Drive/Northstar Drive, and Northstar Drive/267 impacted by additional trips that will be redirected from Highlands View Drive to Ridgeline Drive (MM10-1c)? This may worsen traffic congestion at these busy intersections during peak periods. This mitigation should be managed by Northstar through the changeable message sign proposed above in 2a;

- f. The project should be responsible for its fair share contribution to manual traffic control expenses during peak times at the Northstar Drive roundabout and other intersections within Northstar:
- g. A functional and efficient project transit shuttle system is critical to the success of managing traffic flow from the proposed project to Northstar, especially under peak conditions. The project developer should provide an effective shuttle system that coordinates with the existing Northstar intra-resort transit system to minimize personal auto use into Northstar and maximize transit opportunities.
- 3. The project proposes storm water retention and detention facilities and other drainage infrastructure immediately upslope of and adjacent to Northstar and Sawmill Reservoir. The DEIR indicates that a portion of the project watershed drains towards Northstar lands. In order to ensure performance and long term maintenance of the drainage infrastructure, include mitigation for a stormwater runoff monitoring program similar to the Condition of Approval that was included in the Highlands Phase II Conditional Use Permit
- Northstar supports Water Supply Option 2 which proposes onsite wells for domestic water service and associated mitigation requiring monitoring of surface water and groundwater resources to ensure impacts on water resources are closely monitored.
- 5. The DEIR references the recent CalPeco project approval for the phased upgrade to their 650 electric line which serves Northstar and the proposed project. The 650 electric line improvement is a phased project and has not been fully constructed. Can the utility company continue to provide reliable and consistent electrical supply to both communities, particularly during peak periods, under the existing condition without completion of the 650 line improvement project?

1032-2 cont.

1032-3

1032-4

6. The DEIR acknowledges the lease agreement between SPI and Northstar for cross country skiing and bike trails. Given that the project footprint will eliminate the historic use of these trail networks, Northstar would like to collaborate with the project developer to create a joint recreation plan for multi-use recreational trails that would benefit both communities.

1032-6

Thank you for the opportunity to provide our input regarding this important project. We applaud Placer County for a thorough and thoughtful review of the project.

Sincerely,

Beth Howard, Vice President & General Manager Northstar California

CC (via email):

Gary Blanc, Sierra Pacific Industries Kurt Krieg, Mountainside Partners Blake Riva, Mountainside Partners

Stacy Wydra, Placer County Project Planner

# Northstar California Beth Howard, Vice President and General Manager December 22, 2015

The comment expresses support for the project and commends the project applicant on collaboration with regional stakeholders. The comment recommends that Placer County seek solutions to significant and unavoidable traffic impacts that may be implemented with project construction. Please see response to comment IO18-75 regarding State CEQA Guidelines requirements for mitigation and response to comment IO41-39 regarding additional commenter-recommended mitigation for transportation impacts. The comment does not include specific suggestions for additional feasible mitigation measures to reduce impacts on SR 267. The Draft EIR provides all feasible mitigation measures necessary to reduce significant impacts to less-than-significant levels. Where impacts remain significant after imposing all feasible mitigation, the impacts are identified as significant and unavoidable.

- IO32-2 The comment recommends measures and issues to be considered to address the traffic impacts within the Northstar community. A response is noted, below, in each lettered subpoint:
  - a. The comment suggests the proposed sign on Highlands View Drive be a permanent, changeable message sign.

As indicated in Mitigation Measure 10-1(c), the sign on Highlands View Drive need only operate in the winter, so a permanent sign is not required to implement the measure. Nonetheless, the project applicant would agree to provide a variable message sign, if the County deems it appropriate. However, because the applicant does not own the land or hold an easement from Northstar, Northstar or the Northstar Mountain Master HOA would need to work with the County to establish access to allow a sign. Additionally, because the applicant's role would be phased out after project area land sales are complete, it is expected that the sign would need to be deeded over to a third party for long-term operation (e.g., Northstar, NCSD, or Northstar Mountain Master HOA) with obtainment of an easement and/or permission from the County to install and maintain the sign. The project applicant would work with the County to implement the mitigation measure to provide and install the message sign.

- b. The comment proposes that signage for the Northstar Drive ingress and egress at Highway 267 be improved to delineate turn lanes onto Hwy 267 and into the Village/Castle Peak Parking Lot.
  - This suggested improvement is not related to a project impact. In addition, much of the signage in this area was upgraded with the completion of the County's roundabout improvement project.
- c. The comment proposes signage for both directions on Highway 267 to alert drivers to the MVWP access road, Highlands View Drive, and Northstar Drive.
  - The applicant would be willing to fund a fair share portion of such signage; however, the County has determined that while supplemental signage may be beneficial, it would not be required to mitigate a significant adverse effect of the MVWPSP project.
- d. The comment states that the MVWPSP project would generate 122 full-time equivalent employees, for which the project should identify onsite employee parking to minimize additional trips within Northstar and impacts to existing approved parking. The project

trip generation (see pages 10-21 through 10-3, including Table 10-11 of the Draft EIR) included employee and delivery trips. The external commercial trips are expected to be mostly generated by employee trips and deliveries.

It is not anticipated that employees would park at Northstar, as it would not be convenient to access their place of employment within the MVWPSP project site.

- e. The comment inquires as to what the LOS/delay at Highlands View Drive/Ridgeline Drive, Ridgeline Drive/Northstar Drive, and Northstar Drive/SR 267 would be with the mitigation measure of redirected Highlands View Drive traffic (Mitigation Measure 10-1c).
  - In the Draft EIR (Impact 10-1, pages 10-27 through 10-29), the discussion of significance after mitigation states that the intersections of Northstar Drive/SR 267 and Northstar Drive/Ridgeline Drive would operate at LOS D or better during the winter peak hour after implementing the mitigation. The intersection of Highlands View Drive/Ridgeline Drive would also operate at LOS D or better.
- f. The comment proposes the project be responsible for its fair share contribution to manual traffic control expenses during peak times at the Northstar Drive roundabout and other intersections within Northstar.
  - The project is not shown to have significant impacts at this location. In addition, the following improvements are included in the Tahoe CIP: Northstar Drive / SR 267 intersection improvements, and Northstar Drive (Trimont Lane/Intercept Lot to Basque) widening and intersection improvements. The project would pay its fair share of these improvements through payment of traffic impact fees, as indicated in Mitigation Measure 10-2.
- g. The comment proposes the project provide a shuttle system that coordinates with existing Northstar intra-resort transit system to minimize personal auto use into Northstar.

The project proposes to implement a shuttle with construction of the 340th unit (see Policy CP-13 of the Specific Plan). The shuttle would travel to local destinations, including Northstar. The project shuttle could be coordinated with other shuttles and transit service in the project vicinity.

- The comment requests mitigation requiring a stormwater runoff monitoring program. As discussed on pages 15-25 through 15-27 of the Draft EIR, Mitigation Measures 15-5a and 15-5b require all development resulting from the project to implement low impact development (LID) practices and stormwater infiltration facilities so that development would not result in an increase in runoff leaving the project site. With these mitigation measures, the project would not result in an increase in surface runoff that would result in erosion, siltation, or offsite flooding, or cause the capacity of existing or planned stormwater drainage systems to be exceeded. The impact would be less than significant. In addition, the applicant would undertake a monitoring program for the stormwater drainage system, similar to other projects in the Northstar area. This would not alter the conclusions of the Draft EIR.
- The comment expresses support for Water Supply Option 2, onsite wells, which bring a redundant water supply to the NCSD. The comment is noted.
- The comment expresses concern that without completion of the recently approved CalPeco 650 electric line improvements, the utility could not be able to provide reliable and consistent electrical supply to both the Northstar and MVWPSP communities, particularly during peak periods. Construction of the powerline upgrade is underway and the segment to

Northstar is completed. As discussed in Draft EIR Impact 16-4, Liberty Utilities indicated that it has sufficient capacity to serve the MVWPSP at buildout (see Draft EIR page 16-25).

1032-6

The comment acknowledges the lease agreement between SPI and Northstar for cross country skiing and bike trails and requests collaboration to create a joint recreation plan for multi-use recreation trails. While this comment does not address the adequacy of the Draft EIR, the Applicant has indicated that it would collaborate with Northstar on the possible development of multiuse trails benefiting both communities and the Northstar Ski Resort.

### northstar property owners association



December 15, 2015

Stacy Wydra, Planner Environmental Coordination Services Community Development Resource Agency 3091 County Center Drive, Suite 190 Auburn, CA 95603

Dear Stacy,

Please accept the following comments from the Northstar Property Owners Association (NPOA) regarding the Notice of Preparation of a Draft Environmental Impact Report for the proposed Martis Valley West Parcel Specific Plan Project (State Clearinghouse No. 2014032087).

NPOA is supportive of the Martis Valley West Project, submitted by Mountainside Partners and supports the Mountainside Partners project proposal or Alternative 3: Reduced as stated in the Executive Summary of the DEIR.

We also believe development will eventually take place on Sierra Pacific Industries' land and believe the density/land exchange has a higher upside for the overall community and environment health and the area and we fully support the development of the west parcel rather than the east side parcel. The overall reduction of density and living units parlayed with the permanent retirement of open space to create over 50,000 contiguous acres far outweighs addition development in the Northstar area.

### **Areas of Support:**

- **Permanent Land Conservation Easement:** NPOA supports the 50,000 acres of continuous open space on the East side of Highway 267.
- Density Reduction: NPOA supports the permanent retirement of any development on the east side of Highway 267 and is satisfied with the moderate number of transfer units (760) to the west parcel.
- Public Trails: Existing roads become public trails or new trails developed.
- No Visual Impacts: NPOA supports no ridgeline development.

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1033-1

Traffic Reduction: The MVWP continues the overall reduction of potential 1033-2 units originally slated for development in the original Martis Valley. cont. Areas of Concern: Commercial Development: NPOA does not support large commercial operations but does support neighborhood services that would complement 1033-3 and enhance the potential 760 units or less which would reduce traffic impacts on Highway 267. All required CEQA documents and related studies are carried out. I 1033-4 All steps to avoid lighting, noise and visual nuisance to the Tahoe Basin 1033-5 and Northstar resort should be required. Proposed Uses/Phasing: We understand the desire to phase and change the probable use of single family, townhomes, cabins, condominiums because of 1033-6 changing markets, but all changes should be subject to required studies and a public input process. Amenities: Requirement of substantial amenities to be provided for property owners, such as pools, workout facility, tennis courts, playground and BBQ. These components should be clearly defined Campground: NPOA is opposed to any campground proposal associated

At the direction of the Board of Directors of NPOA,

with the MVW Project now or in the future.

All cumulative future development continues to be considered by Final

Geoff S. Stephens General Manager

### Northstar Property Owners Association Geoff S. Stephens, General Manager December 15, 2015

- This comment expresses support for the proposed project or Alternative 3: Reduced Density Alternative, as described in the MVWPSP Draft EIR. The Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the proposed project and MVWPSP Alternative 3 into consideration when making decisions regarding the project.
- The comment expresses support for the proposed land use changes that would allow for development of the West Parcel and preservation of the East Parcel, as well as the retirement of units, establishment of public trails, and avoidance of ridgeline development. The comment is noted.
- 1033-3 The comment states that NPOA does not support large commercial operations, but supports neighborhood services to support the proposed MVWPSP units and reduce traffic on SR 267. As stated on page 3-6 of the Draft EIR under "Project Objectives," one of the objectives of the project is to identify available opportunities and designate land for small commercial centers where some of the needs of local area residents can be met, eliminating the need for trips outside the area. This is further elaborated on page 3-12 of the Draft EIR, which explains that the expected commercial uses would be businesses such as small retail stores, restaurants, offices, and sports equipment rentals, and that the intent of allowing small commercial/retail uses within the residential designation is to provide services and amenities to residents and visitors within the MVWPSP and minimize the need for trips outside of the project site. Finally, as stated on page 3-16 of the Draft EIR, commercial development would be designed to support project residents and guests rather than attracting patrons from outside the development. The MVWPSP limits the total commercial/retail area to 34,500 square feet of building space on 6.6 acres of land, which could be distributed throughout the Residentialdesignated area on parcels of any size.
- The comment expresses concern that all required CEQA documents and related studies are completed. For explanation of the environmental review process as required by CEQA, see Chapter 1 of the Draft EIR, specifically Section 1.6, "Environmental Review Process and Public Involvement." The public has had access to review the complete Draft MVWPSP, the Draft EIR, and the NOP and Initial Study, all of which are available on the County's website. The EIR is supported by numerous technical studies, as cited in the technical chapters of the EIR and included in Chapter 22, "References Cited and Persons Consulted," in the Draft EIR.

The EIR includes a mitigation monitoring and reporting program (MMRP), prepared in compliance with the requirements of California Public Resources Code (PRC) Section 21081.6 and Section 15097 of the CEQA Guidelines that identifies specific timing and monitoring requirements for implementation of all mitigation measures identified in the EIR. Please see Chapter 23 and Table 23-1 of the Draft EIR. All of the mitigation measures for the MVWPSP included in the EIR would be monitored through the County's Standard Mitigation Monitoring Program (Table 23-1). Some mitigation measures require ongoing implementation and would require monitoring even after a Final Map is recorded, a Certificate of Occupancy is issued, or other discretionary permit is vested or ministerial permit is accepted as complete. Table 23-1 also identifies the mitigation measures that require ongoing implementation, the party(ies) responsible for funding implementation, the necessary timing of implementation that would occur outside the scope of the County's Standard Mitigation Monitoring Program, and the mechanisms for monitoring compliance with each mitigation measure.

Further, the subject of the County's approval decision is the overall MVWPSP addressed in the EIR. When subsequent activities in the program are proposed, the County will have to determine whether the environmental effects of those activities were adequately addressed in the program EIR and/or whether additional environmental documents must be prepared. If a later activity would have effects that were not examined in the program EIR, a project-specific CEQA document would be required.

- 1033-5 The comment expresses concern that the project take steps to avoid lighting, noise, and visual impacts to the Tahoe Basin and Northstar. Such impact avoidance measures are included in the Specific Plan itself (see Appendices B and C of the MVWPSP, Development Standards and Design Guidelines, respectively) and the Draft EIR. Potential project-related impacts are evaluated in the Draft EIR related to these issues; see Chapter 9, "Visual Resources," for discussion of visual, light, and glare impacts, and see Chapter 13, "Noise," for evaluation of short- and long-term noise impacts. As presented in these Draft EIR chapters, mitigation measures are imposed where necessary to reduce significant impacts to less-than-significant levels. The MVWPSP noise and visual impacts would be less than significant from Martis Valley, Northstar and from within the Tahoe Basin. No structures would be visible from the key observation points in the Basin and tree removal visible from the Basin would be largely obscured by remaining trees. Project features visible from Northstar would appear as partially screened, dark/earthtoned-colored structures nestled in distant trees; structures would not appear silhouetted above the ridge, nor would obvious clearings or linear or angular patterns result from the project (see Impact 9-1). In addition, light sources from the project would not be visible from the key observation points in the Basin or the Fibreboard Freeway, but they would be visible from Martis Valley. The new light sources visible from Martis Valley would be less prominent than existing light sources because the new light sources would be partially screened by vegetation and topography, and at a greater viewing distance than existing light sources, which reduces the appearance of illumination (see Impact 9-4).
- IO33-6 The comment recommends that phasing and project proposals pursuant to the MVWPSP be subject to required studies and public input processes. See response to comment IO33-4, above.
- The comment recommends that amenities for property owners be defined. Please see Chapter 6, "Open Space, Trails, and Recreation," of the proposed MVWPSP as well as pages 3-19 and 3-20 of the Draft EIR, "Project Description," for a description of proposed open space, trails, and homeowner amenities. . The commenter's opinion regarding additional definition of amenities in the Specific Plan are noted.
- The comment expresses opposition to a campground proposal. While there is no campground proposed as part of the MVWPSP project, a separate proposal, the Brockway Campground, has been submitted to Placer County and was considered in the cumulative projects listed in Chapter 4 of the Draft EIR and evaluated in Chapters 5 through 18. The Brockway Campground project will undergo separate environmental review. For additional discussion of the Brockway Campground proposal, please see Master Response 2.
- The comment recommends consideration of cumulative development in the EIR. Cumulative impacts are assessed in the EIR, as required by CEQA and the State CEQA Guidelines. The cumulative impact analysis methodology, scope, and cumulative projects list are described in Chapter 4, "Approach to Environmental Analysis," of the Draft EIR. Cumulative impacts are addressed within each resource chapter (see Chapters 5 through 18 of the Draft EIR).

### **Shirlee Herrington**

1034

1034-1

From: Steve Pearsall <pearsalltahoe@gmail.com>
Sent: Tuesday, December 08, 2015 11:02 AM

To: Placer County Environmental Coordination Services

**Subject:** Martis Valley West

My family and I, in fact our entire neighborhood, are concerned about the subject housing development and the Brockway campground. Lake Tahoe and the surrounding basin has reached it's limit of human imprint. We depend upon you, our government, to protect this national treasure.

Although many of the project's impacts are stated as being "less than significant," removing 37,000+ trees and disturbing 11 million square feet (253 acres) on an approximately 600-acre ridgeline bench overlooking Lake Tahoe would certainly be significant in terms of forest and wildlife destruction.

Please consider the long range implication of these projects and do your duty.

Thank you.

Steve Pearsall Crystal Bay, NV

### I034 Steve Pearsall December 8, 2015

1034-1

The comment expresses concerns related to tree removal and wildlife impacts associated with the project. This issue is evaluated in Draft EIR Impact 5-5, "Convert substantial forest land or adversely affect timber resources." This impact discloses that approximately 651.5 acres of forest land (per the PRC Section 12220(g) definition) could be converted to nonforested, developed uses on the West Parcel. Tables 5-3 through 5-7 provide data on the forest habitats, numbers of trees, and the estimated loss that would occur due to full buildout of the MVWPSP. The estimated loss of 651.5 acres of forest land from development of the West Parcel and loss of 11.6 acres of forest land from offsite utility connections would not substantially reduce the quantity or quality of these coniferous forest habitats in the region. Of the estimated 21,798 trees 6-inches dbh or greater that would be removed on the West Parcel, most are white fir. Sierran mixed conifer and white fir forest are common and widely distributed in the region and elsewhere in the Sierra Nevada, and the amount of forest disturbance and loss would be small relative to the total amount available in the region. No sensitive forest types, such as aspen forest or old growth forest, would be removed. The existing forest on the West Parcel has been regularly maintained through harvest procedures for forest health and reduction of fire risk. Furthermore, the MVWPSP proposes to preserve the entire 6,376-acre East Parcel either by sale to a land trust or similar organization or by recordation of a conservation easement, preserving in perpetuity an estimated 5,951.2 acres of forest land and connecting an estimated 50,000 acres of open space and forested lands east of SR 267. The Forest-designated lands on the East Parcel and the West Parcel would be restricted to timber harvest and compatible uses under the TPZ zone and approved THPs, protecting the timber resource value of those areas. Therefore, the conversion of forest land and impacts to timber resources were determined to be less than significant.

In addition, please see Draft EIR Chapter 7, "Biological Resources," and Chapter 9, "Visual Resources," for a discussion of effects related to tree removal.

Regarding the concern expressed in the comment related to the Brockway Campground, please note that the Brockway Campground is not part of the proposed project, as discussed in Master Response 2.

#### **Shirlee Herrington**

1035

From: D Kanare <dkanare@hotmail.com>
Sent: Saturday, November 28, 2015 6:43 PM

**To:** Placer County Environmental Coordination Services **Subject:** Martis Valley West and Tahoe Ridgeline Development

Dear Placer County Officials,

I have been following the story concerning the proposed developments for Martis Valley West that will be built outside the Lake Tahoe basin and the proposed campground that will be built inside the Lake Tahoe basin near the ridge line above Kings Beach. While I am the owner and broker for the RE/MAX franchise in Incline Village and would normally support a well-planned development, these two projects will have enormous negative impacts resulting from increased traffic, ambient lighting, crowds, noise and a host of environmental impacts, not all of which can be predicted in advance of the project's completion.

1035-1

I strongly oppose any development whatsoever on or near the ridge line around Lake Tahoe. And the reality is that there is no practical way to widen Highway 267. So, when we ultimately have either a natural disaster from an earthquake or excessive snowfall or a wildfire from either natural or man-made causes the scene will be worse than the Oakland Hills fire where 25 people died because they had no safe route by which to escape.

1035-2

The developer is only concerned about making a profit and they have absolutely no regard for trying to preserve the beautiful pristine ridgeline on the North Shore of Lake Tahoe. I have hiked in this area many times and feel this area should be off-limits to development of the type being proposed. I would support a small development of single-family homes on large lots as long as there was a stipulation that any lighting would not be visible anywhere in the Lake Tahoe basin.

1035-3

Visitors come to Lake Tahoe to enjoy the mountain environment and developments like the ones proposed will ultimately lead to the demise of the Lake Tahoe basin as we know it today. Please enter my opposition into the official record.

Thank you.

Best Wishes,

Don

Don Kanare Broker / Owner RE/MAX North Lake 775-745-5820 (cell) 775-833-3665 (Fax)

E-mail: <u>Don@InsideIncline.com</u>
Web Site: <u>www.InsideIncline.com</u>

1

## Don Kanare Broker/Owner RE/Max North Lake November 28, 2015

The comment expresses opposition to the MVWPSP project and concerns regarding increased traffic, ambient lighting, crowds, and noise. All issues raised in the comment are addressed in the Draft EIR. The Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the proposed MVWPSP into consideration when making decisions regarding the project.

The comment expresses opposition to development on the ridgeline around Lake Tahoe. See responses to comments IO27-1, IO18-42, and IO18-44.

The comment also suggests that there is not a feasible way to widen SR 267 and raises concerns regarding emergency evacuation. Chapter 10, "Transportation and Circulation," of the Draft EIR includes discussions of the existing traffic conditions and an analysis of project-specific and cumulative traffic impacts. Emergency evacuation and wildfire hazards are addressed in Chapter 18, "Hazards and Hazardous Materials." Please see Master Response 9 related to wildland fire, emergency evacuation, and the draft Emergency Preparedness and Evacuation Plan prepared as part of the MVWPSP.

The comment expresses opposition to the project, citing preservation of the ridgeline around Lake Tahoe and potential support for a small development of single-family homes if no lighting was visible from anywhere in the Basin. Please see response to comment IO35-2, above, regarding visual resource concerns. Comments regarding preferences for a project alternative will be forwarded to the Placer County Planning Commission and Board of Supervisors for their consideration when making decisions regarding the project.



1036

Whitman F. Manley wmanley@rmmenvirolaw.com

November 13, 2015

#### VIA EMAIL

Karin E. Schwab, Esq. Placer County Counsel's Office 175 Fulweiler Avenue Auburn, CA 95603

Michael Johnson, Director Community Development Placer County 3091 County Center Drive Auburn, CA 95603

Dear Ms. Schwab and Director Johnson:

We represent the applicant for the Martis Valley West Parcel Specific Plan Project (MVWPSP), and submit this letter on its behalf.

We are writing to provide our views on the MVWPSP EIR's analysis of traffic impacts, particularly from a regional perspective. We believe this perspective is timely because there appears to be increased interest among public agencies in the region in weighing in on projects outside of their jurisdictional boundaries.

First, the MVWPSP is located entirely within Placer County. The initial proposal straddled the Tahoe Basin. In response to input from the Tahoe Regional Planning Agency (TRPA) and others, the applicant modified the project so that it is located entirely outside the Tahoe basin. For this reason, Placer County is the sole land-use authority with jurisdiction over the project. In particular, because the project is located entirely outside the Tahoe basin, the MVWPSP does not require approval from TRPA. Other agencies, such as Caltrans, have jurisdiction over specific aspects of the project, but Placer County is the only agency with land-use authority. The limited jurisdiction of Caltrans, and of other agencies with permitting authority over a portion of the project, is noted in Table 3-7. The County, as the lead agency, is the sole agency that will determine whether the EIR complies with CEQA. (Pub. Resources Code, § 21082.1, subd. (a).)

1036-1

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Karin E. Schwab, Esq. Michael Johnson November 13, 2015 Page 2

Second, the traffic impacts of the MVWPSP are significantly lower than those that were anticipated to occur per the approved Martis Valley Community Plan (MVCP):

- The MVCP authorized and anticipated up to 1,360 residential units in the project area. The MVWPSP EIR estimates that, under the existing MVCP, the project area will generate 6,593 vehicle trips per day.
- If the County approves the MVWPSP, the number of residential units will be reduced by 600 units, from 1,360 to 760 residential units, a reduction of 44%. The corresponding number of vehicle trips per day will be reduced by 2,608 vehicle trips per day, from 6,593 to 3,985, a reduction of 40%.

(See MVWPSP EIR, p. 19-18.)

More generally, overall traffic volumes in the region are much lower than anticipated in the MVCP. That is largely because projects in the MVCP have "built out" at much lower unit counts than contemplated under the MVCP or approved project land has been conserved (e.g. Waddle Ranch, Siller/Martis Camp). Specifically, to date there are 1,466 fewer residential units to be constructed in Martis Valley compared to the MVCP. In addition, the Martis Valley West Project will permanently retire 600 residential units, resulting in a total reduction of 2,066 units in Martis Valley. As the attached table shows, the number of residential units, and daily vehicle trip generation, are roughly 35% lower than County projections at the time it approved the MVCP.

We appreciate the opportunity to provide these comments.

Very truly yours

Whitman F. Manley

Enclosure

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1036-2

		Table 1	1		
Comparison of Traff	ic Generatior	ı for Martis Valle	ey Comm	unity Pla	Comparison of Traffic Generation for Martis Valley Community Plan and Martis Valley West
			Daily 1-Way Vehicle-Trips	-Way -Trips	
	Dwelling Units	Commercial Floor Area	Total	Tahoe Basin	Source
Martis Valley Community Plan Development Capacity (inclusive of MVWPSP 600 unit reduction)	velopment Capa	city (inclusive of			
2003 MVCP Approval	6,154	223,845	63,813	9,660	MVCP FEIR Appendix B
Adjusted MVCP Development Capacity @ 2014	4,088	134,845	41,770	6,323	Application of MVCP rates to revised land uses
Change in MVCP **	-2,066 -34%	-89,000 -40%	-22,043 -35%	-3,337 -35%	
MVWPSP Project Proposed Development Capacity	opment Capacity				
SPI lands-max units***	1,360	6.6 acres	6,594	2,308	Application of MVWPSP DEIR rates, assuming no change in commercial
MVWPSP Proposed****	092	34,500	3,985	1,395	MVWPSP Draft EIR, August 2015
Change in MVWPSP	-600	1 1	-2,609	-913	

<sup>\*</sup> After 2005 settlement, MV to have 8,600 total units inclusive of existing units

<sup>\*\*</sup> Land acquisition resulted in some areas zoned for development remaining undeveloped; projects that were developed did not buildout at the maximum allowed by zoning. As a result of these two factors, the holding capacity of the Martis Valley has been reduced by 2,066 units and 89,000 sf of commercial

<sup>\*\*\*</sup>MVCP zoned 670 acres of SPI-owned land (the East Parcel) for residential development (up to 1,360 units) and 6.6 acres of commercial

<sup>\*\*\*\*</sup>MVWPSP proposes to develop 662 acres of SPI-owned land (the West Parcel) with up to 760 du and 6.6 acres of commercial (34,500 sf) and to rezone the East Parcel to preclude any residential development

# Remy Moose Manley Whitman F. Manley November 13, 2015

- The comment references the traffic analysis in the EIR and reiterates information contained in the EIR, including that the Specific Plan is located within Placer County and does not require approval from TRPA. This information is included in the Draft EIR in Chapter 3, "Project Description," and is stated in response to comments throughout this Final EIR.
- The comment states the MVWPSP project's traffic impacts are lower than those anticipated under the approved Martis Valley Community Plan (MVCP) with a 44 percent reduction in residential units, and an estimated 40 percent reduction in vehicle trips per day.

The comment reiterates information found in the Draft EIR; notably, it cites the same reduction in potential daily vehicle trips that is included in Table 19-1 under the Transportation and Circulation analysis of Alternative 2, the "No Project – MVCP Alternative." As discussed in the letter and under Alternative 2 (see page 19-18 of the Draft EIR), the proposed project would generate 3,985 daily vehicle trips and the potential MVCP allocation of 1,360 residential units would generate 6,593 daily vehicle trips.

- The comment states that overall traffic volumes in the region are much lower than anticipated in the MVCP, and states that other projects in Martis Valley have been built with 1,466 fewer units than approved in the MVCP. The comment notes that the MVWPSP project would also retire 600 residential units from the total that was approved in the MVCP. The comment cites an attached table as showing that there would be a reduction in the daily vehicle trip generation from the approved MVCP by roughly 35 percent. The comment is acknowledged. While the plan-to-plan comparison is illustrative, the conclusions of the traffic impact analysis are based on project effects as compared to the existing setting, that is, to the undeveloped condition.
- A table comparison of traffic generation for Martis Valley Community Plan and Martis Valley West Parcel Specific Plan is presented. See response to comment IO36-3.

### **Shirlee Herrington**

1037

From:Sandra <sandrarichards007@gmail.com>Sent:Tuesday, December 15, 2015 11:39 AM

**To:** Placer County Environmental Coordination Services

Subject: Deny

Enough is enough
She can't take anymore We are killing Tahoe

1037-1

Sandra Richards 775 220 9911

Sandra Ventre Richards

(775) 220-9911 Cell

## Sandra Richards December 15, 2015

The comment expresses concern for Lake Tahoe. The comment does not directly address any specific aspect of the proposed the MVWPSP project, nor does it provide a comment on the content, analysis, or conclusions of the Draft EIR. The comment is noted.

Shirlee Herrington		1038	]
From: Sent: To: Subject:	Robert Rene <renejanrobert@gmail.com> Monday, December 21, 2015 9:31 PM Shirlee Herrington Opposition to Martis Valley</renejanrobert@gmail.com>		
I am writing to express my opposition to the Martis Valley project.			
There is no need for more luxury properties. One only has to pick up the local real estate magazines to see spectacular multi million dollar properties. There is no dearth of high end housing in the area.			
The added traffic alone should be reason enough to disallow the project. If you were to drive highway 267 around 5pm in the next two weeks, you will experience the gridlock on that route. Now throw in a fire or some other disaster and you have exacerbated the escape route.			1038-2
I cannot believe that the developers really want to put in campgrounds and you should not believe it either. It is a red herring to get the approval and "mitigate" at a later date.			1038-3
Thank you,			
Rene Robert			
renejanrobert@gmail.com			

### Rene Robert December 21, 2015

- The comment expresses opposition to the MVWPSP. The comment does not specifically address the content, analysis, or conclusions of the Draft EIR. The Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the proposed MVWPSP into consideration when making decisions regarding the project.
- The comment expresses concern regarding traffic and emergency evacuation. See Draft EIR Chapter 10, "Transportation and Circulation," which describes the existing conditions and potential traffic and circulation effects associated with the MVWPSP. For concerns related to emergency evacuation, please see Master Response 9.
- IO38-3 The comment expresses concern regarding constructing campgrounds. The MVWPSP does not include campsites. The comment is referring to the Brockway Campground Project proposal, which will be subject to separate environmental review. Please see Master Response 2 regarding the Brockway proposal.

### **Shirlee Herrington**

1039

From: Robert Schladale <rschladale@gmail.com>
Sent: Sunday, December 06, 2015 8:05 PM

To: Placer County Environmental Coordination Services

**Subject:** Comments on Martis Valley West

To: Placer County Board of Supervisors

Re: Martis Valley West Project Draft Environmental Impact Report

We are residents of Auburn and also maintain a home in Carnelian Bay. We are writing to urge you to DENY approval for the Martis Valley West Project. We believe the proposed development of a large gated community of single- and multi-family homes plus the proposed campground is incompatible with the existing zoning of this area and would have significant negative impacts on the area environment. In particular, the projects will lead to problems with water supply and quality, air quality, and traffic.

1039-1

The Draft EIR suggests that the new developments will only be occupied 20% of the time, and therefore the impacts will be minor. However, it's likely that virtually all of the units will be occupied in the summer and during holidays and good ski weekends. We have plenty of first-hand experience of the traffic in the Tahoe basin at prime times and it has already reached the breaking point. We have on occasion been forced to wait on lines of traffic that are miles long, and that move at barely a few miles an hour. Placing additional pressure on North Tahoe roads just makes no sense. Not only will it further degrade the Tahoe experience for residents and vacationers, but it will create serious problems for emergency responders. Any forest fire would be much more difficult to fight. It is critical to note that North Tahoe is not like South Tahoe, where fire fighters had multiple routes with which to access the Angora fire back in 2007. In North Tahoe, we typically have a single route, either highway 28 or 267, to get anywhere.

1039-2

1039-3

Given the constraints inherent in the North Tahoe geography, and if Placer County wants to maintain Tahoe as a desirable vacation destination, the county should view Tahoe as already "built out". This is not to say there cannot be any more building, but that such building should focus on in-fill in existing areas where there are already roads and utilities, and where the landscape has already been altered. While any new homes would result in additional traffic, with an infill approach the quantity would be smaller and much more manageable than the proposed development. An infill alternative would provide for a modest amount of growth that would also protect the undeveloped forests and ridges of Tahoe, which are key to retaining the qualities that make Tahoe the special place it is.

1039-4

Thank you for considering our thoughts. Our contact information is below.

43

Sincerely,

Robert Schladale and Lois Williams

164 Sierra Sunrise Way

Auburn, CA 95603

916-601-9059

## Robert Schladale and Lois Williams December 6, 2015

The comment expresses opposition to the MVWPSP and expresses concerns about compatibility with existing zoning, and effects on water supply and quality, air quality and traffic. The comment does not specifically address the content, analysis, or conclusions in the Draft EIR, however. All issues raised in the comment are addressed in the document. The comment refers to a proposed campground; however, the MVWPSP does not include campsites. The comment is referring to the Brockway Campground Project proposal, which is a separate project and will be subject to its own environmental review. Please see Master Response 2 regarding the Brockway proposal. The Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the proposed MVWPSP into consideration when making decisions regarding the project.

The comment asserts that the Draft EIR suggest the new development would only be occupied 20 percent of the time. This is erroneous. The 20 percent cited in the comment is defined in the EIR as 20 percent of the proposed units being occupied by permanent, full-time residents. As stated on page 3-16 of the Draft EIR:

Based on the data from these nearby developments as well as coordination and guidance from Placer County staff, this EIR assumes that the majority of the population (approximately 80 percent) would be seasonal and/or transient, because the residential units would be primarily second homes and fractional units. Based on that assumption, approximately 20 percent of the project population is expected to be full-time, permanent residents (Fehr & Peers 2014). This assumption is conservative because, based on actual data, the percentage of full-time residences is substantially lower than 20 percent.

See Master Response 5 regarding occupancy assumptions, trip generation assumptions, and traffic analysis methodology.

- The comment expresses concerns related to the project's effect on emergency evacuation.

  Please see Master Response 9 related to wildland fire, emergency evacuation, and the draft Emergency Preparedness and Evacuation Plan prepared as part of the MVWPSP.
- The comment states that Tahoe should be considered "built out," and building should be focused on in-fill in existing areas. The MVWPSP would not involve any development within the Lake Tahoe Basin. See response to comment IO18-7. The comment also suggests that an in-fill alternative should be considered. See Master Response 10 regarding alternatives.

#### **Shirlee Herrington**

1040

I 1040-7

From: Ejschommer@aol.com

Sent: Thursday, December 03, 2015 4:14 PM

**To:** Placer County Environmental Coordination Services

Subject: Comment - Martis Valley West DEIR

Placer County Board of Supervisors:

Re: Martis Valley West Project Draft Environmental Impact Report

This is to urge you to deny approval for the Martis Valley West Project [MVW] for the following reasons:

1. This intensive development, and the adjacent Brockway Campground within the Tahoe Basin, is not located next to any public services or existing infrastructure.

2. This massive project of residential and commercial is not compatible with existing zoning or land use.

3. These projects will have significant traffic, transit and circulation impacts on the entire area.

4. Removing about 37,000 trees and disturbing 253 acres on the 600 acre ridgeline overlooking Lake Tahoe will be detrimental to this pristine forested area.

5. A development of this size will be highly visible from North Lake Tahoe and the Martis Valley.

I 1040-3

I 1040-4

I 1040-5

I 1040-6

7. The cumulative negative environmental impacts to the Lake Tahoe Basin of these projects must not be ignored.

Sincerely, Ed & Joan Schommer 1122 Regency Way Tahoe Vista, CA

## I040 Ed and Joan Schommer December 3, 2015

The comment expresses concerns that the project is not located near any public services or existing infrastructure. Please see Chapter 17 of the Draft EIR for a discussion of impacts and mitigation measures related to public services, and Chapter 16 of the Draft EIR for a discussion of impacts and mitigation measures related to utilities. Regarding the location of the Brockway Campground, please see Master Response 2 regarding the Brockway Campground proposal, which is a separate project subject to its own environmental review.

The comment asserts that the proposed project would not be compatible with existing zoning or land use. These issues are addressed in Chapter 5 in the Draft EIR. Please see response to comment IO18-5, which explains that as a proposed Specific Plan, the action being considered by Placer County is a planning action: redesignation of land uses, rezoning of lands, and preservation of lands. If approved, the MVWPSP would supersede the MVCP, thereby changing the locations of potential development in the Martis Valley. Placer County is authorized to adopt a Specific Plan under the provisions of Sections 65450 through 65457 of the California Government Code and Section 17.58.200 of the Placer County Code. These provisions require that a Specific Plan be consistent with the adopted General Plan of the jurisdiction in which the plan is located, and sets forth the contents of the Specific Plan. Through approval of the MVWPSP, the newly proposed land use designations and zoning would be made consistent with both the Placer County General Plan and the MVCP.

The comment asserts that that the project would impact transit, traffic, and circulation. These issues are addressed in Chapter 10 of the Draft EIR. The comment does not specifically address the content, analysis, or conclusions of the Draft EIR. The Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the proposed MVWPSP into consideration when making decisions regarding the project.

The comment expresses concerns related to tree removal and its effect on the forest. This issue is evaluated in Draft EIR Impact 5-5, "Convert substantial forest land or adversely affect timber resources." This impact discloses that approximately 651.5 acres of forest land (per the PRC Section 12220(g) definition) could be converted to non-forested, developed uses on the West Parcel. Tables 5-3 through 5-7 provide data on the forest habitats, numbers of trees, and the estimated loss that would occur due to full buildout of the MVWPSP. The estimated loss of 651.5 acres of forest land from development of the West Parcel and loss of 11.6 acres of forest land from offsite utility connections would not substantially reduce the quantity or quality of these coniferous forest habitats in the region. Of the estimated 21,798 trees 6-inches dbh or greater that would be removed on the West Parcel, most are white fir. Sierran mixed conifer and white fir forest are common and widely distributed in the region and elsewhere in the Sierra Nevada, and the amount of forest disturbance and loss would be small relative to the total amount available in the region. No sensitive forest types, such as aspen forest or old growth forest, would be removed. The existing forest on the West Parcel has been regularly maintained through harvest procedures for forest health and reduction of fire risk. Furthermore, the MVWPSP proposes to preserve the entire 6,376-acre East Parcel either by sale to a land trust or similar organization or by recordation of a conservation easement, preserving in perpetuity an estimated 5,951.2 acres of forest land and connecting an estimated 50,000 acres of open space and forested lands east of SR 267. The Forest-designated lands on the East Parcel and the West Parcel would be restricted to timber harvest and compatible uses under the TPZ zone and approved THPs, protecting the timber resource value of those areas. Therefore, the conversion of forest land and impacts to timber resources were determined to be less than significant.

Please see Draft EIR Chapter 7, "Biological Resources," and Chapter 9, "Visual Resources," for a discussion of effects related to tree removal.

In addition, the MVWPSP area does not contain 600 acres overlooking Lake Tahoe. A portion of the Specific Plan area is adjacent to the Tahoe Basin watershed with views of Lake Tahoe, but the majority of the site is located farther north where views from the Basin are screened by topography and trees.

1040-5

The comment expresses concerns related to the visibility of the project from the Martis Valley and North Lake Tahoe. The Draft EIR acknowledges that the proposed project would be visible from some vantage points in Martis Valley, but views from the Basin would be screened by topographic features and trees. See Draft EIR Impact 9-1 for a discussion of the MVWPSP's proposed location of structures relative to ridgelines, and design and screening measures to minimize the visibility of structures and graded areas. See Impact 9-3 for a discussion of MVWPSP design standards and their effect on the character and visual quality of the area. In addition, the effects of project lighting on nighttime views are analyzed in Impact 9-4, "New Sources of Light and Glare," beginning on page 9-45. As described in the Draft EIR, the MVWPSP project would not be visible from viewpoints in the Lake Tahoe Basin and would have less-than-significant effects on scenic vistas and nighttime views from the Lake Tahoe Basin. Furthermore, specific MVWPSP design standards (see Appendix B of the Specific Plan) require that "Visual impacts of development will be minimized by using the natural features and terrain, along with built features and landscaping to screen buildings. Tree removal shall be kept to the minimum level feasible to provide natural screening for project elements,...", and "Scenic corridors will not be significantly impacted by development, when feasible, including open meadows, the forested corridor along SR 267, ridgelines and peaks where development activities would be visible from surrounding areas." Please see Chapter 9, "Visual Resources," and Master Response 4 regarding the methodology for the visual analysis.

1040-6

The comment asserts that the project would result in detrimental traffic impacts in North Lake Tahoe. These issues are addressed in Chapter 10 of the Draft EIR as well as in Master Response 6, regarding VMT. The comment does not specifically address the content, analysis, or conclusions of the Draft EIR. The Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the proposed MVWPSP into consideration when making decisions regarding the project.

1040-7

The comment asserts that adverse cumulative environmental impacts to the Lake Tahoe Basin must not be ignored. The Draft EIR does not ignore cumulative impacts to the Lake Tahoe Basin; rather it includes a cumulative analysis that includes potential effects to the Lake Tahoe Basin. As explained in Section 4.1 of the Draft EIR, the geographic scope of impacts related to biological resources, traffic, visual resources, night lighting, air emissions, GHGs, population/employment/housing, wildfire hazards, emergency evacuation, recreation, and associated cumulative impacts addresses the broader Truckee-Tahoe region as discussed in each of those resource chapters of the Draft EIR. Furthermore, the cumulative projects considered in the cumulative impact analyses (provided at the end of each resource chapter, Draft EIR Chapters 5 through 18) are listed in Table 4-2 of the EIR and include projects in the Truckee-Tahoe region.